EXHIBIT 16

From:

David Campbell

To:

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Subject:

James Fields" Answers to Interrogatories and Requests for Production

Date: Attachments: Monday, April 16, 2018 4:53:53 PM Fields First Answers to Interogs and RFPs.pdf

All,

Attached, please find James Fields' Answers to Plaintiffs' Interrogatories and Requests for Production of Documents. Please advise whether you require newspaper and internet articles produced in physical form or pdf for the production of documents. As indicated in the response, these documents were located by "Googling" James Fields and August 12, 2017, Charlottesville Rally. I can have these documents scanned and emailed within in 24 hours or will be happy to mail hard copies. However, if you require hard copies, I ask that you provide one or two law offices for production of the physical documents due to the number of associated counsel for Plaintiffs. Alternatively, I can provide a list of each article and the website or newspaper with date.

Thanks,

Dave

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